

Before the
Federal Communications Commission
Washington, D.C. 20554

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

Comments of School District of Haverford Township,
(Licensee for WHHS Havertown, PA)
to Notice of Proposed Rulemaking
Docket No. 02-382 RM-10615
Federal Communications Commission Notice of Proposed Rulemaking
dated December 13, 2002, In the matter of Amendment of
Section 73.202(b) FM Table of Allotments,
FM Broadcast Stations.

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The School District of Haverford Township (the "District") is a second class public school district located in suburban Philadelphia, Pennsylvania. The District is currently licensed by the FCC to operate WHHS, a non-commercial FM radio station, currently broadcasting at frequency 107.9, with an assigned facility number of 59344. The District hereby opposes the proposal contained in the subject Notice of Proposed Rulemaking adopted December 13, 2002 and released December 16, 2002 on the basis that the proposal would adversely impact and/or eliminate the operation of WHHS at 107.9 frequency and thereby eliminate one of only a handful of operating public high school radio stations in the United States. WHHS has operated continuously for 55 years since on or about 1948, serving Haverford Township (population 50,000) and surrounding communities to the extent of the station's broadcasting range.

During this period of time WHHS has served Haverford Township and surrounding communities with a variety of programming, including but not limited to local and state political debates, local election returns, interviews with local and state elected officials including the lieutenant governor of Pennsylvania, a wide variety of musical programming and news and public interest features. In addition, WHHS has provided to interested community members and, most importantly, to students of the School District of Haverford Township an opportunity to be involved in and study the operations of a live broadcasting radio station. WHHS has provided innumerable opportunities for students as evidenced by current student interest and activity in operating the station and by alumni support for the continued operations of the station. During the 55 year history of WHHS, literally thousands of students have been exposed to broadcasting, journalism, engineering and other fields of pursuit due to their involvement with WHHS. Dozens of graduates have gone on to careers and rewarding jobs

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in broadcasting and related fields. Such opportunities for high school students are so rare as to be virtually non-existent.

WHHS has a long and useful history of serving its local community and the students and staff of the School District. The District submits that to the extent that the proposed rulemaking is detrimental to the broadcast operations of WHHS or to the extent that the proposal would essentially stop WHHS from broadcasting, that the public interest would be harmed. In the geographic region served by WHHS, there are well in excess of twenty - five commercial radio stations broadcasting at a strength necessary to reach the population of Haverford Township. To remove a public high school radio station of current and historical significance from broadcasting in this region in favor of an additional commercial broadcasting entity from New Jersey would be harmful to the public interest favoring access to noncommercial broadcasts in a geographic region, particularly one operated by a public school entity. The District further submits that approval of petitioners proposal will not result in a preferential arrangement in allotments because it would result only in the addition of one more Philadelphia media outlet at the expense of a rare and valuable asset to the region and the broadcasting community, namely, WHHS. Finally, any decision to move WHHS we understand might result in costs of approximately \$175,000 or greater. Such a result would work a considerable economic hardship on the District, a public school entity. In fact, it would almost certainly prove to be prohibitively expensive.

Respectfully Submitted,



Leonard J. Vender, D.Ed.

Superintendent



Dennis J. Kelley

Board Secretary